

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

JIAJIA LUO, Individually and on Behalf of  
All Others Similarly Situated,

Plaintiffs,

v.

SOGOU INC., SOHU, INC., TENCENT  
HOLDINGS LIMITED, XIAOCHUAN  
WANG, CHARLES (CHAOYANG)  
ZHANG, YUXIN REN, JOANNA  
(YANFENG) LU, BIN GAO, JOSEPH  
CHEN, JANICE LEE, and JAMES  
(XIUFENG) DENG,

Defendants

Case No.: 1:19-cv-00230-JPO

Hon. J. Paul Oetken

**STIPULATION ON APPOINTMENT OF LEAD PLAINTIFF AND CO-LEAD  
COUNSEL**

WHEREAS, two motions for appointment as lead plaintiff and approval of selection of counsel were filed on the March 11, 2019 statutory deadline in the above-captioned securities class action brought pursuant to the Private Securities Litigation Reform Act of 1995 (“PSLRA”) on behalf of investors in Sogou Inc., by: (1) Lizhen Zhang, Juean Xu, Yuehua Ding, and Maggie Xu (the “Sogou Investor Group”) (Dkt. No. 8); and (2) Mark S. Frater (“Frater”) and Ketan Patel (“Patel”) (Dkt. No. 11);

WHEREAS, the Sogou Investor Group and Mr. Frater and Mr. Patel disagree as to which movant has proper claim to the largest financial interest in the outcome of the litigation, *see* Dkt. Nos. 14, 16, but agree that the interests of the putative class will be best served by a combined group utilizing the resources of both movants;

WHEREAS, the Sogou Investor Group and Mr. Frater and Mr. Patel are committed to supervising the conduct of this litigation by their counsel and to ensuring that counsel coordinate

appropriately and avoid any duplication of effort in the conduct of the litigation;

IT IS HEREBY STIPULATED, that subject to the Court's approval, the Sogou Investor Group and Mr. Frater and Mr. Patel agree to serve as Lead Plaintiff as the Combined Investor Group and Levi & Korsinsky, LLP ("Levi & Korsinsky") and the Rosen Law Firm ("Rosen") agree to serve as Co-Lead Counsel.

Dated: April 1, 2019

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*Additional Counsel for Movants*

**CERTIFICATE OF SERVICE**

I, Shannon L. Hopkins, hereby certify that this document was filed through the CM/ECF system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) on this 1<sup>st</sup> day of April, 2019.

/s/Shannon L. Hopkins

Shannon L. Hopkins

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Case No.: 1:19-cv-00230-JPO

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**ORDER APPOINTING LEAD PLAINTIFF AND APPROVING SELECTION  
OF CO-LEAD COUNSEL**

**I. APPOINTMENT OF LEAD PLAINTIFF AND APPROVAL OF COUNSEL**

1. Each member of the Combined Investor Group has timely moved this Court to be appointed as Lead Plaintiff in the above-captioned action (the “Action”) and to approve their counsel as Lead Counsel.

2. Having considered the provisions of Section 21D(a)(3)(B) of the PSLRA, 15 U.S.C. § 78u-4(a)(3)(B), the Court hereby determines that the Combined Investor Group is the most adequate plaintiff and satisfies the requirements of the PSLRA. The Court hereby appoints the Combined Investor Group as Lead Plaintiff to represent the interests of the class.

3. Pursuant to Section 21D(a)(3)(B)(v) of the PSLRA, 15 U.S.C. § 78u-4(a)(3)(B)(v), the Combined Investor Group has selected and retained the law firms of Levi & Korsinsky and Rosen to serve as Co-Lead Counsel. The Court approves the Combined Investor Group’s selection of Co-Lead Counsel.

4. Co-Lead Counsel shall have the following responsibilities and duties, to be carried out either personally or through counsel whom Co-Lead Counsel shall designate:

- a. to coordinate the briefing and argument of any and all motions;
- b. to coordinate the conduct of any and all discovery proceedings;
- c. to coordinate the examination of any and all witnesses in depositions;
- d. to coordinate the selection of counsel to act as spokesperson at all pretrial conferences;
- e. to call meetings of the plaintiffs' counsel as deemed necessary and appropriate from time to time;
- f. to coordinate all settlement negotiations with counsel for defendants;
- g. to coordinate and direct the pretrial discovery proceedings and the preparation for trial and the trial of this matter, and to delegate work responsibilities to selected counsel as may be required;
- h. to coordinate the preparation and filings of all pleadings; and
- i. to supervise all other matters concerning the prosecution or resolution of the claims asserted in the Action.

5. No motion, discovery request, or other pretrial proceedings shall be initiated or filed by any plaintiffs without the approval of Co-Lead Counsel, so as to prevent duplicative pleadings or discovery by plaintiffs. No settlement negotiations shall be conducted without the approval of the Co-Lead Counsel.

6. Service upon any plaintiff of all pleadings, motions, or other papers in the Action, except those specifically addressed to a plaintiff other than the Lead Plaintiff, shall be completed upon service of Co-Lead Counsel.

7. Co-Lead Counsel shall be the contact between plaintiffs' counsel and defendants' counsel, as well as the spokespersons for all plaintiffs' counsel, and shall direct and coordinate the activities of plaintiffs' counsel. Co-Lead Counsel shall be the contact between the Court and plaintiffs and their counsel.

## **II. NEWLY FILED OR TRANSFERRED ACTIONS**

8. When a case that arises out of the subject matter of this Action is hereinafter filed in this Court or transferred from another Court, the Clerk of this Court shall: (a) file a copy of this Order in the separate file for such action; (b) mail a copy of this Order to the attorneys for the plaintiff(s) in the newly filed or transferred case and to any new defendant(s) in the newly filed or transferred case; and (c) make the appropriate entry on the docket for this action.

9. Any new case that arises out of the same or substantially similar subject matter as this Action that is filed in this Court or transferred to this Court shall be consolidated with the Action and this Order shall apply thereto, unless a party objecting to this Order files an application showing good cause for relief from this Order within ten (10) days after the date upon which a copy of this Order is served on counsel for such party, and this Court deems it appropriate to grant such application.

10. During the pendency of this litigation, or until further order of this Court, the parties shall take reasonable steps to preserve all documents within their possession, custody or control, including computer-generated and stored information and materials such as computerized data and electronic mail, containing information that is relevant to or which may lead to the discovery of information relevant to the subject matter of the pending litigation.

IT IS SO ORDERED.

DATED: April 2, 2019

  
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J. PAUL OETKEN  
United States District Judge